

MEMPHIS DOWNTOWN:  
One Commerce Square, Ste 2000  
Memphis, Tennessee 38103  
telephone: (901) 259-7100  
facsimile: (901) 259-7150

Charles B. Welch, Jr.  
cbwelch@farris-law.com

**FARRIS MATHEWS BRANAN  
BOBANGO & HELLEN, PLC**  
ATTORNEYS AT LAW

HISTORIC CASTNER KNOTT BUILDING  
618 CHURCH STREET, SUITE 300  
NASHVILLE, TENNESSEE 37219-2436

(615) 726-1200 Telephone  
(615) 726-1776 Facsimile

August 10, 2001

MEMPHIS EAST:  
530 Oak Court Drive, Ste. 345  
Memphis, Tennessee 38117  
telephone: (901) 762-0530  
facsimile: (901) 683-2553

Writer's Direct Dial:  
(615) 687-4230

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

VIA HAND DELIVERY

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance  
(INTERLATA) Service in Tennessee Pursuant to Section 271 of the  
Telecommunications Act of 1996*  
Docket No. 97-00309

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of the Petition of NewSouth Communications Corporation for Leave to Intervene to be filed in the above-captioned proceeding. I have provided copies to all counsel of record.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,  
BOBANGO & HELLEN, P.L.C.**

*Charles B. Welch, Jr.*  
Charles B. Welch, Jr.

CBW:lw

Enclosures

cc: Lori Reese

PAID  
8/10/01  
CK#1192 \$25.00  
PAID  
8/10/01

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:** )  
 )  
**BELLSOUTH COMMUNICATIONS, INC.'S)**  
**ENTRY INTO LONG DISTANCE ) Docket No.: 97-00309**  
**(INTERLATA) SERVICE IN TENNESSEE )**  
**PURSUANT TO SECTION 271 OF THE )**  
**TELECOMMUNICATIONS ACT OF 1996 )**

---

**PETITION OF NEWSOUTH COMMUNICATIONS CORPORATION  
FOR LEAVE TO INTERVENE**

---

NewSouth Communications Corporation ("NewSouth") , pursuant to Tennessee Code Annotated § 4-5-310, § 65-2-107, and the Rules of the Tennessee Department of State Administrative Procedures Division, Chapter 1360-4-1-.12, petitions to intervene in the referenced docket, and in support of its Petition states as follows:

1. NewSouth is a certified, competitive provider of local exchange telephone services.
2. NewSouth petitions to intervene in order to ensure that its interests are represented.
3. As a certified telecommunication service provider, NewSouth's legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding, and Petitioner's interest will not be adequately represented unless allowed to intervene.
4. The Petitioner's participation will not impair the interest of justice or the orderly prompt conduct of the Authority's proceeding.
5. This petition to intervene is being filed at least seven (7) days before the

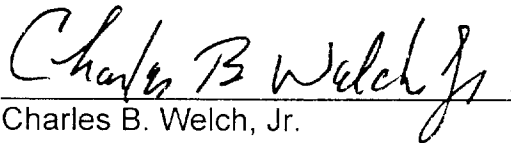
hearing of this cause.

WHEREFORE, PREMISES CONSIDERED, NewSouth, prays that they be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, and to receive copies of any notices, orders or any other documents filed herein, and have such other, further and general relief as the justice of their cause entitle them to receive.

DATED this the 10<sup>th</sup> day of August, 2001.

Respectfully submitted,

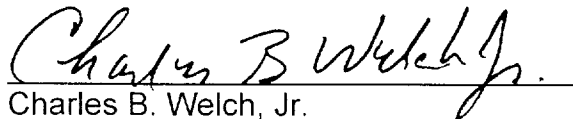
**FARRIS, MATHEWS, BRANAN  
BOBANGO & HELLEN, P.L.C.**

A handwritten signature in cursive script, reading "Charles B. Welch, Jr.", is written over a horizontal line.

Charles B. Welch, Jr.  
Attorney for Petitioner  
618 Church Street, Ste. 300  
Nashville, Tennessee 37219  
(615) 726-1200

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, upon the following parties of record, this the 10<sup>th</sup> day of August, 2001.

  
Charles B. Welch, Jr.

H. LaDon Baltimore, Esq.  
Farrar & Bates  
211 Seventh Ave., N., #320  
Nashville, TN 37219-1823

Jon E. Hastings, Esq.  
Boult, Cummings, et al.  
PO Box 198062  
Nashville, TN 37219-8062

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

Steven T. Brown  
Director, State Regulatory Policy  
Intermedia Communications  
3625 Queen Palm Drive  
Tampa, FL 33619

Carolyn Roddy Tatum, Esq.  
Sprint Communications  
3100 Cumerland Circle, N0802  
Atlanta, GA 30339

Guilford Thornton, Esq.  
Stokes & Bartholomew  
424 Church St.  
Nashville, TN 37219

D. Billye Sanders, Esq.  
Waller, Lansden, Dortch & Davis  
511 Union St., Suite 2100  
Nashville, TN 37219-1750

Tim Phillips, Esq.  
Attorney General's Office  
Consumer Advocate and Protection  
Division  
PO Box 20207  
Nashville, TN 37202

Jim Lamoureux, Esq.  
AT&T Communications of the South  
Central States  
1200 Peachtree St., NE  
Room 4060  
Atlanta, GA 30309

Andrew M. Klein, Esq.  
Kelley, Drye & Warren, LLP  
1200 19<sup>th</sup> Street, NW  
Washington, DC 20036

John McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom  
1755 North Brown Rd.  
Lawrenceville, GA 30043

Andrew O. Isar, Esq.  
ASCENT  
3220 Uddenberg Lane, NW  
Gig Harbor, WA 98335

Fred J. McCallum  
Lisa Foshee  
BellSouth Telecommunications, Inc.  
675 W. Peachtree St., Suite 4300  
Atlanta, GA 30375

Susan Berlin  
MCI WorldCom, Inc.  
Six Concourse Pkwy., #3200  
Atlanta, GA 30375

Donald L. Scholes, Esq.  
Branstetter, Kilgore, Stranch & Jennings  
227 Second Avenue North  
Fourth Floor  
Nashville, TN 37219

John L. Quinn, Esq.  
Nakamura & Quinn  
2100 First Avenue, North, #300  
Birmingham, AL 35203

James Wright, Esq.  
United Telephone-Southeast  
14111 Capitol Blvd.  
Wake Forest, NC 27587

Nanette S. Edwards  
Director Regulatory Advocacy  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802